

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ADA B. TRONCOSO,

Plaintiff,

v.

Case No.: 1:13-cv-390-LO-JFA

BANK OF AMERICA, N.A., et al.,

Defendants.

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S
ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT**

Defendant, Equifax Information Services LLC ("Equifax"), by undersigned counsel, hereby files its answer and defenses to Plaintiff's Complaint ("Complaint").

PRELIMINARY STATEMENT

In answering the Complaint, Equifax states that it is responding to allegations on behalf of itself only, even where the allegations pertain to alleged conduct by all Defendants. Equifax denies any and all allegations in the headings and/or unnumbered paragraphs in the Complaint.

ANSWER

In response to the specific allegations in the enumerated paragraphs in the Complaint, Equifax responds as follows:

1. Equifax admits that Plaintiff purports to bring an action for actual, statutory, and punitive damages under the Fair Credit Reporting Act and other statutes. As those claims relate to Equifax, Equifax denies Plaintiff's entitlement to any relief.

2. To the extent Plaintiff has properly alleged her claims, Equifax admits that this Court may exercise jurisdiction over those claims.

3. To the extent Plaintiff has properly alleged her claims, Equifax admits the Court may exercise supplemental jurisdiction over Plaintiff's state law claims.

4. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 and, therefore, denies same.

5. Equifax admits the allegations in Paragraph 5.

6. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 and, therefore, denies same.

7. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 and, therefore, denies same

8. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 and, therefore, denies same.

9. Equifax is without knowledge or information sufficient to form a belief as to the truth of allegations in Paragraph 9, and, therefore, denies same.

10. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 and, therefore, denies same.

11. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 and, therefore, denies same.

12. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 and, therefore, denies same.

13. Responding to the allegations in Paragraph 13, Equifax states that it is a limited liability company with its principal place of business in Georgia and authorized to do business in Virginia.

14. Responding to the allegations in Paragraph 14, Equifax states that it is a consumer reporting agency as that term is defined in the FCRA.

15. Equifax admits that it provides consumer reports to third parties under with a permissible purpose under contract and that it receives monetary compensation for the reports.

16. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 and, therefore, denies same.

17. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17 and, therefore, denies same.

18. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 and, therefore, denies same.

19. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19 and, therefore, denies same.

20. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20 and, therefore, denies same.

21. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 and, therefore, denies same.

22. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 and, therefore, denies same

23. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 and, therefore, denies same

24. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 and, therefore, denies same

25. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25, and, therefore, denies same.

26. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26, and, therefore, denies same.

27. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, and, therefore, denies same.

28. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, and, therefore, denies same.

29. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29, and, therefore, denies same.

30. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, and, therefore, denies same.

31. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31, and, therefore, denies same.

32. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32, and, therefore, denies same.

33. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33, and, therefore, denies same.

34. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34, and, therefore, denies same.

35. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35, and, therefore, denies same.

36. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36, and, therefore, denies same.

37. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37, and, therefore, denies same.

38. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38, and, therefore, denies same.

39. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39, and, therefore, denies same.

40. Equifax admits Plaintiff requested a consumer disclosure in May 2012. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 40, and, therefore, denies same.

41. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41, and, therefore, denies same.

42. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42, and, therefore, denies same.

43. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43, and, therefore, denies same.

44. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44, and, therefore, denies same.

45. Equifax admits that Plaintiff requested a consumer disclosure in December 2012 and that Bank of America reported her last mortgage payment in July 2012. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 45, and, therefore, denies same.

46. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46, and, therefore, denies same.

47. Equifax admits it received Plaintiff's letter of December 19, 2012. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 47, and, therefore, denies same.

48. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48, and, therefore, denies same.

49. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49, and, therefore, denies same.

50. Equifax admits it provided results of its reinvestigation to Plaintiff on or about December 31, 2012. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 50, and, therefore, denies same.

51. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51, and, therefore, denies same.

52. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52, and, therefore, denies same.

53. Equifax admits it received Plaintiff's letter of January 25, 2013. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53, and, therefore, denies same.

54. Equifax admits it provided results of its reinvestigation to Plaintiff on or about February 4, 2013. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54, and, therefore, denies same. .

55. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55, and, therefore, denies same.

56. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56, and, therefore, denies same.

57. Equifax denies the allegations in Paragraph 57 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 57.

58. Equifax denies the allegations in Paragraph 58 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 58.

59. In response to Paragraph 59 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

60. Equifax states that Virginia law speaks for itself. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 60, and, therefore, denies same.

61. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, and, therefore, denies same.

62. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, and, therefore, denies same.

63. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63, and, therefore, denies same.

64. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64, and, therefore, denies same.

65. In response to Paragraph 65 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

66. Equifax denies the allegations in Paragraph 66 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 66.

67. Equifax denies the allegations in Paragraph 67 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 67.

68. Equifax denies the allegations in Paragraph 68 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 68.

69. Equifax denies the allegations in Paragraph 69 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 69.

70. In response to Paragraph 70 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

71. Equifax denies the allegations in Paragraph 71 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 71.

72. Equifax denies the allegations in Paragraph 72 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 72.

73. Equifax denies the allegations in Paragraph 73 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 73.

74. Equifax denies the allegations in Paragraph 74 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 74.

75. In response to Paragraph 75 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

76. Equifax denies the allegations in Paragraph 76 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 76.

77. Equifax denies the allegations in Paragraph 77 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 77.

78. Equifax denies the allegations in Paragraph 78 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 78.

79. Equifax denies the allegations in Paragraph 79 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 79.

80. In response to Paragraph 80 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

81. Equifax denies the allegations in Paragraph 81 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 81.

82. Equifax denies the allegations in Paragraph 82 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 82.

83. Equifax denies the allegations in Paragraph 83 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 83.

84. Equifax denies the allegations in Paragraph 84 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 84.

85. In response to Paragraph 85 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

86. Equifax denies the allegations in Paragraph 86 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 86.

87. Equifax denies the allegations in Paragraph 87 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 87.

88. Equifax denies the allegations in Paragraph 88 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 88.

89. Equifax denies the allegations in Paragraph 89 as they pertain to it. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 89.

90. In response to Paragraph 90 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

91. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91, and, therefore, denies same.

92. Equifax admits that it uses the e-Oscar system when it processes some disputes. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 92, and, therefore, denies same.

93. Equifax admits it sometimes uses the ACDV form when processing disputes. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 93, and, therefore, denies same.

94. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94, and, therefore, denies same.

95. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, and, therefore, denies same.

96. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, and, therefore, denies same.

97. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, and, therefore, denies same.

98. Equifax admits it forwarded an ACDV to Bank of America when it processed one or more of Plaintiff's disputes. Equifax is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 98, and, therefore, denies same.

99. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, and, therefore, denies same.

100. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, and, therefore, denies same.

101. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, and, therefore, denies same.

102. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102, and, therefore, denies same.

103. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103, and, therefore, denies same.

104. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 and, therefore, denies same

105. Equifax states that the law speaks for itself.

106. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, and, therefore, denies same.

107. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107, and, therefore, denies same.

108. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, and, therefore, denies same.

109. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 and, therefore, denies same

110. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110 and, therefore, denies same

111. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 and, therefore, denies same

112. In response to Paragraph 112 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

113. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113, and, therefore, denies same.

114. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, and, therefore, denies same.

115. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, and, therefore, denies same.

116. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116, and, therefore, denies same.

117. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117, and, therefore, denies same.

118. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 and, therefore, denies same.

119. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 and, therefore, denies same.

120. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and, therefore, denies same.

121. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and, therefore, denies same.

122. In response to Paragraph 122 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

123. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, and, therefore, denies same.

124. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 and, therefore, denies same

125. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and, therefore, denies same.

126. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and, therefore, denies same

127. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127, and, therefore, denies same.

128. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128, and, therefore, denies same.

129. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129 and, therefore, denies same.

130. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130, and, therefore, denies same.

131. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131 and, therefore, denies same.

132. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132, and, therefore, denies same.

133. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133, and, therefore, denies same.

134. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, and, therefore, denies same.

135. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, and, therefore, denies same.

136. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, and, therefore, denies same.

137. In response to Paragraph 137 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

138. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 and, therefore, denies same

139. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139, and, therefore, denies same.

140. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140, including its subparts, and, therefore, denies same.

141. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, and, therefore, denies same.

142. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, and, therefore, denies same.

143. In response to Paragraph 143 of Plaintiff's Complaint, Equifax reasserts and realleges its responses and defenses as set forth above.

144. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144, and, therefore, denies same.

145. Equifax denies all allegations not expressly admitted or stated otherwise herein.

DEFENSES

Without assuming the burden of proof where it otherwise rests with the Plaintiff, Equifax pleads the following defenses to Plaintiff's Complaint:

FIRST DEFENSE

Equifax asserts that Plaintiff's Complaint fails in whole or in part to state a claim against Equifax upon which relief can be granted.

SECOND DEFENSE

Equifax has complied with the provisions of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*, in its handling of Plaintiff's credit file.

THIRD DEFENSE

At all times relevant herein, Equifax maintained reasonable procedures in its handling of Plaintiff's consumer credit file.

FOURTH DEFENSE

Plaintiff's damages, if any, were not caused by Equifax; but rather, they were caused by another person or entity for whom or for which Equifax is not responsible.

FIFTH DEFENSE

Equifax has acted in good faith and without malice or intent to injure Plaintiff.

SIXTH DEFENSE

Plaintiff's complaint seeks the imposition of punitive damages. Equifax adopts by reference the defenses, criteria, limitations, standards and constitutional protections mandated or provided by the United States Supreme Court in the following cases: BMW v. Gore, 517 U.S. 559 (1996); Cooper Indus., Inc. v. Leatherman Tool Group, Inc., 532 U.S. 923 (2001) and State Farm v. Campbell, 538 U.S. 408 (2003).

SEVENTH DEFENSE

Equifax reserves the right to assert additional defenses that it learns of through the course of discovery.

WHEREFORE, having fully answered or otherwise responded to the allegations in Plaintiff's Complaint, Equifax prays that:

- (1) Plaintiff's Complaint be dismissed in its entirety and with prejudice, with all costs taxed against Plaintiff;
- (2) That Equifax have a trial by jury on all issues so triable;
- (3) That Equifax be dismissed as a party to this action;
- (4) That this lawsuit be deemed frivolous and Equifax recover from plaintiff its expenses of litigation, including but not limited to attorneys' fees; and
- (5) That Equifax recover such other and additional relief, as the Court deems just and appropriate.

This 7th day of May, 2013.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of May, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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